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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 JANE DOE,)	Case No. 3:16-CV-2298 JST
)	
17 Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER CONTINUING INITIAL CASE
18 vs.)	MANAGEMENT CONFERENCE
)	
19 METROPOLITAN LIFE INSURANCE)	Complaint Filed: April 27, 2016
20 COMPANY,)	
)	
21 Defendant.)	

22 Plaintiff JANE DOE ("Plaintiff") and Defendant METROPOLITAN LIFE INSURANCE
23 COMPANY ("Defendant") (collectively "the Parties"), through their counsel stipulate as follows:

24 **RECITALS**

25 1. Plaintiff filed the Complaint initiating this action on April 27, 2016, alleging that
26 Defendant had improperly determined that she was not entitled to continuing long term disability
27 ("LTD") benefits and failed to make a timely decision on her appeal of that adverse benefits
28 determination.

2. The Court set an Initial Case Management Conference for August 3, 2016, with a Joint Case Management Statement due on July 27, 2016.

3. Defendant is in the process of completing an administrative review of Plaintiff's LTD appeal and expects to issue a determination in the next 30 to 45 days, which could materially impact the status of this case and what issues, if any, may proceed.

4. Accordingly, the Parties agree that continuing the Initial Case Management Conference to September 7, 2016 is appropriate in order to avoid unnecessary fees and cost, and to give the parties an opportunity to better understand the issues involved and to advise the Court of the issues to be presented.

STIPULATION

The Parties hereby stipulate pursuant to Civil Local Rule 16-1(b) that the Initial Case Management Conference is continued from August 3, 2016 to September 7, 2016, or as soon thereafter as is convenient for the Court. The Parties further stipulate that their deadline to file a Joint Case Management Conference Statement will be August 31, 2016.

Dated: July 1, 2016

HINSHAW & CULBERTSON LLP

By: /s/ Peter J. Felsenfeld

J. RUSSELL STEDMAN

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Attorneys for Defendant METROPOLITAN
LIFE INSURANCE COMPANY

Dated: July 1, 2016

BOLT KEENLEY KIM LLP

By: /s/ James P. Keenley

JAMES P. KEENLEY

Attorneys for Plaintiff JANE DOE

SIGNATURE ATTESTATION

I hereby attest that I have obtained the concurrence of James P. Keenley, Esq., counsel for Plaintiff Jane Doe, for the filing of this stipulation.

/s/ Peter J. Felsenfeld
PETER J. FELSENFELD

PROPOSED ORDER

**PURSUANT TO THE FOREGOING STIPULATION OF THE PARTIES, IT IS
HEREBY ORDERED THAT:**

1. The Initial Case Management Conference be continued from August 3, 2016 to September 7, 2016; and
2. The Parties deadline to file a Joint Case Management Conference Statement be extended to August 31, 2016.

DATED: July 1, 2016



JON S. TIGAR
SENIOR UNITED STATES DISTRICT JUDGE